

DENNIS J. HERRERA, State Bar #139669
 City Attorney
 JOANNE HOEPER, State Bar #114961
 Chief Trial Attorney
 SEAN F. CONNOLLY, State Bar # 152235
 Deputy City Attorney
 Fox Plaza
 1390 Market Street, 6th Floor
 San Francisco, California 94102-5408
 Telephone: (415) 554-3863
 Facsimile: (415) 554-3837
 E-Mail: sean.connolly@sfgov.org

Attorneys for Defendants
 CITY AND COUNTY OF SAN FRANCISCO, ET AL.

BENJAMIN NISENBAUM, State Bar # 222173
 LAW OFFICES OF JOHN L. BURRIS
 Airport Corporate Centre
 7677 Oakport Street, Suite 1120
 Telephone: (510) 839-5200
 Facsimile: (510) 839-3882

Attorneys for Plaintiff
 ESTHER HWANG

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

ESTHER HWANG,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
 FRANCISCO, ET AL.

Defendants.

Case No. C07-02718 MMC

**STIPULATION TO ENLARGE TIME
 TO COMPLETE DISCOVERY;
 [PROPOSED] ORDER**

Whereas the parties have been continuing in good faith to complete discovery;
 Whereas the parties have successfully completed a significant amount of necessary discovery;
 Whereas the City has completed no fewer than eight depositions, and written discovery;
 Whereas the parties have continued to meet and confer regarding any outstanding issues of
 discovery;

Whereas certain impediments outside the parties control have prevented plaintiff from obtaining records essential to completing discovery and depositions of the defendant police officers;

Whereas certain impediments outside the parties control have prevented defendants from obtaining essential medical and psychiatric records of plaintiff, without which defendants cannot complete expert discovery;

Whereas the parties agree that receipt of these respective records is essential to completing both fact and expert discovery;

Whereas, the parties have met and conferred and agree that the deadline to complete factual discovery should be extended to until June 27, 2008;

Whereas the parties have met and conferred and agree that the deadline to make expert disclosures should be extended to July 25, 2008;

Whereas the parties have met and conferred and agree that the deadline to complete expert discovery should be extended to until October 10, 2008;

Whereas, this proposed modified discovery schedule will not change or upset the dates set by the court for jury trial in this matter.

IT IS SO STIPULATED BY THE PARTIES:

Dated: June 5, 2008

DENNIS J. HERRERA
City Attorney
SEAN F. CONNOLLY
Deputy City Attorney

By: s/Sean F. Connolly
SEAN F. CONNOLLY
Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, et al.

Dated: June 5, 2008

BENJAMIN NISENBAUM, ESQ.
JOHN BURRIS, ESQ.
Law Officers of John Burris

By: s/John Burris
JOHN BURRIS
Attorney for Plaintiff
ESTHER HWANG

1 PURSUANT TO STIPULATION,

2
3 IT IS SO ORDERED.

4
5 DATED:

6 JUDGE MAXINE M. CHESNEY
7 UNITED STATES DISTRICT COURT
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27